

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
FLORENCE DIVISION**

Liberty Property Holdings SC, LLC
individually, derivatively on behalf of
Renaissance Tower Horizontal Property
Regime, and on behalf of a class of all others
similarly situated; Azure Bleu, LLC; Edelyne
Beauvais-Thomas; Jason E. Blosser; Nicole
M. Blosser; Eshellah D. Calhoun; Zachary G.
Calhoun; David DiMaio; Linda DiMaio;
Susan H. Ferguson; Four Parts Whole, LLC;
Sharon M. Hubbard; Carol A. Messenger;
Jeffrey S. Palmer; Summalin, Inc.; Terry J.
Tuminello; Shelley Ware; and Jonathan S.
Williams,

Plaintiffs,

v.

Jeffrey L. Richardson; William S. Spears;
Brent M. Whitesell; Laurie Z. Wunderley;
Madeline R. Mercer; Catherine M. Gregor;
Dennis J. Sassa; Tracy A. Meadows; Peter A.
Grusauskas; and William Douglas
Management, Inc.,

Defendants.

CIVIL ACTION NO.: 4:22-cv-03556-RBH

**PLAINTIFFS' MOTION FOR
EXTENSION OF TIME TO FILE
RESPONSE TO DEFENDANTS'
MOTION TO DISMISS**

Plaintiffs Liberty Property Holdings SC, LLC; Azure Bleu, LLC; Edelyne Beauvais-Thomas; Jason E. Blosser; Nicole M. Blosser; Eshellah D. Calhoun; Zachary G. Calhoun; David DiMaio; Linda DiMaio; Susan H. Ferguson; Four Parts Whole, LLC; Sharon M. Hubbard; Carol A. Messenger; Jeffrey S. Palmer; Summalin, Inc.; Terry J. Tuminello; Shelley Ware; and Jonathan S. Williams, (all plaintiffs together, "Plaintiffs"), by and through their undersigned counsel, respectfully move this Court for an Order extending by ten days the time for Plaintiffs to file a

response to Defendants' Motion to Dismiss. Defendants' Motion to Dismiss was filed on December 13, 2022, and Plaintiffs' response is currently due on January 26, 2023. Plaintiffs were previously granted an extension of thirty days to file their response. Plaintiffs request the additional ten days due to work and family obligations, including unanticipated obligations.

The undersigned sought and obtained consent to the proposed extension from all parties. This motion is made in good faith and not for the purpose of unnecessary delay.

WHEREFORE, Plaintiffs respectfully move the Court for an Order extending the deadline for Plaintiffs to file their response to Defendants' Motion to Dismiss by ten days.

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